

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN DIVISION**

CHARLENE MARTINEZ, individually and on behalf of all others similarly situated,

Plaintiff,

v.

TD BANK, USA, N.A., a National Bank, and TARGET CORPORATION, a Minnesota corporation,

Defendants.

Case No. 1:15-cv-07712-JBS-AMD

Hon. Jerome B. Simandle

Magistrate Judge Ann Marie Donio

JOINT STIPULATION

**JOINT STIPULATION
FOR EXTENSION OF TIME TO RESPOND**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 6.1, it is hereby STIPULATED AND AGREED by and between counsel for Plaintiff Charlene Martinez (“Plaintiff”) and Defendants TD Bank, USA, N.A. and Target Corporation (collectively “Defendants”), that the date by which Defendants shall answer, move, or otherwise respond to Plaintiff’s First Amended Complaint (ECF No. 25) shall be May 27, 2016.

In support of the instant Stipulation, the Parties state that the First Amended Complaint was filed on March 1, 2016. Pursuant to the Court’s Order of February 24, 2016 (ECF No. 24), Defendants were provided with sixty days from the date of the filing of the Amended Complaint to answer or otherwise respond. Accordingly, Defendants’ response is currently due on May 2, 2016.¹

¹ Defendant Target Corporation waived service of process on March 10, 2016, providing for sixty days from that date to respond to the First Amended Complaint, or May 9, 2016.

The current extension is sought and agreed upon by all Parties, as counsel for Defendants recently changed firms, leading to a transfer of files and counsel involved on the matter.

The Parties have not previously requested an extension of time to respond to Plaintiff's First Amended Complaint. No Parties will be prejudiced by this extension.

Accordingly, the Parties request an extension of time for Defendants to answer, move, or otherwise respond to Plaintiff's First Amended Complaint, up to and including May 27, 2016.

Dated: April 20, 2016

s/ Stefan Louis Coleman

Stefan Louis Coleman
I.D. No. 000382009
Law Offices of Stefan Coleman, LLC
1072 Madison Avenue, Suite 1
Lakewood, NJ 08701
Tel: (877) 333-9427
Fax: (888) 498-8946

Counsel for Charlene Martinez

s/ Jarrod D. Shaw

Jarrod D. Shaw
I.D. No. 015732004
McGuireWoods LLP
EQT Plaza
625 Liberty Avenue, 23rd Floor
Pittsburgh, PA 15222
Tel: (412) 667-6000
Fax: (412) 667-6050
jshaw@mcguirewoods.com

Counsel for TD Bank, USA, N.A. and Target Corporation

CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2016, I electronically filed the foregoing using the Court's CM/ECF system, which will then send a notification of such filing to all counsel of record.

s/ Jarrod D. Shaw